

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
---	-------------------------------

This document relates to:

Thomas Burnett, Sr., et al. v. Al Baraka Invest. & Develop. Corp., et al., No. 03-CV-5738
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03-CV-6978
Kathleen Ashton, et al v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Continental Casualty Co. et al, v. Al Qaeda, et al., No. 04-CV-5970
New York Marine & General Insurance Co. v. Al Qaida, et al., No. 04-CV-6105
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04-CV-7279
WTC Properties LLC, et al. v. Al Baraka, et al., No. 04-CV-7280
Tremsky v. Bin Laden, et al., No. 02-CV-7300

**AFFIRMATION OF SEAN P. CARTER TRANSMITTING EVIDENCE IN SUPPORT
OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO THE
CONSOLIDATED MOTION TO DISMISS OF THE SAUDI RED CRESCENT SOCIETY
AND DR. ABDUL RAHMAN AL SWIALEM**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following documents in support of Plaintiffs' Consolidated Memorandum of Law In Opposition to the Consolidated Motion to Dismiss of the Saudi Red Crescent Society and Dr. Abdul Rahman al Swailem.

2. Exhibit 1 to this Affirmation is a true and accurate copy of an article entitled *Dreams of Martyrdom Draw Islamic Arabs to Join Afghan Rebels*, published by the Washington Post Foreign Service on July 21, 1986.

3. Exhibit 2 to this Affirmation is a true and accurate copy of a 1998 Department of Defense Report entitled *Swift Knight Report Concerning Terrorist Activities of Sheikh Usam Ben Muhammad Ben Avad Ben Laden*, prepared by the United States Department of Defense October 1998.

4. Exhibit 3 to this Affirmation is a true and accurate copy of the *Second Report of the U.N. Monitoring Group on Al Qaida*, published by the United Nations in December 2003.

5. Exhibit 4 to this Affirmation is a true and accurate of the Government's Evidentiary Proffer Supporting the Admissibility of Co-Conspirator Statements, United States v. Enaam Arnaout, 02-CR-892 (N.D. IL.).

6. Exhibit 5 to this Affirmation is a true and accurate copy of an article entitled *US Fears Terrorist Attack in Kosovo*, published by BBC News on April 3, 2000.

7. Exhibit 6 to this Affirmation is a true and accurate copy of an article entitled *Pakistan: Two Sudanese Held in Egyptian Embassy Blast Case*, published by The News on February 1, 1996.

8. Exhibit 7 to this Affirmation is a true and accurate copy of an article entitled *Ayman Al-Zawahiri: Attention Turns to the Other Prime Suspect*, published by Jane's Intelligence Review on October 23, 2001.

9. Exhibit 8 to this Affirmation is a true and accurate copy of an article entitled *Who Is Ayman al Zawahiri*, published by MSNBC.Com, on March 25, 2004.

10. Exhibit 9 to this Affirmation is a true and accurate copy of an article entitled *Bin Laden Underling Raised Money in U.S.*, published by NewsMax.com Wires on October 12, 2001.

11. Exhibit 10 to this Affirmation is a true and accurate copy of an article entitled *Government Seeks Deportation of NGO's Arab Workers*, published by Rawalpindi Jang on October 3, 2001.

12. Exhibit 11 to this Affirmation is a true and accurate copy of an article entitled *ONASA carries biographies of six Algerians handed over to US officials*, published by ONASA, on January 18, 2002.

Affirmed in Philadelphia, Pennsylvania on September 20, 2005.

_____/s/
Sean P. Carter